

Craig K. Perry  
Nevada Bar No. 3786  
CRAIG K. PERRY & ASSOCIATES  
6210 N. Jones Blvd. #753907  
Las Vegas, Nevada 89136-8985  
Telephone: (702) 228-4777  
Facsimile: (702) 943-7520  
[cperry@craigperry.com](mailto:cperry@craigperry.com)

Chris R. Miltenberger, Esquire  
The Law Office of Chris R. Miltenberger, PLLC  
1360 N. White Chapel, Suite 200  
Southlake, Texas 76092-4322  
817-416-5060 (office)  
817-416-5062 (fax)  
[chris@crmlawpractice.com](mailto:chris@crmlawpractice.com)  
*Pro Hac Vice*

Max S. Morgan, Esquire  
**THE WEITZ FIRM, LLC**  
1515 Market Street, #1100  
Philadelphia, PA 19102  
Tel: (267) 587-6240  
Fax: (215) 689-0875  
[max.morgan@theweitzfirm.com](mailto:max.morgan@theweitzfirm.com)  
[eric.weitz@theweitzfirm.com](mailto:eric.weitz@theweitzfirm.com)  
*Pro Hac Vice*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

STEPHAN CAMPBELL, *on behalf of  
himself and all others similarly situated,*

Plaintiff,

v.

EVERYTHING BREAKS, INC.,

Defendant.

Case No.: 2:23-cv-00861-GMN-EJY

**MOTION TO CONVERT MAY 14,  
2024 HEARING ON PLAINTIFF'S  
MOTION TO COMPEL  
DISCOVERY RESPONSES TO  
VIDEOCONFERENCE; PROPOSED  
ORDER**

**TO THE COURT, EACH PARTY AND THEIR ATTORNEY OF  
RECORD:**

**PLEASE TAKE NOTICE** that pursuant to this Court's procedures, Plaintiff Stephan Campbell ("Plaintiff"), by and through his attorneys of record, will and hereby does move this Honorable Court for an order converting the May 14, 2024 Hearing on Plaintiff's Motion to Compel Discovery Responses to a Videoconference hearing and permitting Plaintiffs' Counsel (i.e., Craig Perry, Chris R. Miltenberger and Max S. Morgan) to appear remotely at the hearing set to occur on May 14, 2024 at 10:00 AM. ECF No. 33.

Plaintiff's Co-Lead Counsel Chris Miltenberger is located in Southlake, Texas (Dallas/Fort Worth Metroplex). Plaintiff's Co-Lead Counsel Max Morgan is located in Philadelphia, PA. Mr. Miltenberger intends to argue Plaintiff's Motion to Compel Discovery Responses at the May 14, 2024 hearing with the support of Mr. Morgan. Travel to Las Vegas for Mr. Miltenberger would involve 7 hours between travel to the airports, courthouse, and flight time. Costs would be over \$700 for airfare and hotel. Travel to Las Vegas for Mr. Morgan would involve 8 hours between travel to the airports, courthouse, and flight time. Costs would be over \$1,000 for airfare and hotel. On May 8, 2024, the Court granted Defense Counsel's request to appear remotely. The parties anticipate that a videoconference appearance will likely only involve about 1 hour of time. Thus, to appear in person at this hearing will be a substantial cost that may be reasonably avoided by a video/Zoom or telephonic appearance for Mr. Miltenberger and Mr. Morgan.

PLAINTIFF'S MOTION TO CONVERT MAY 15, 2024 HEARING ON PLAINTIFF'S MOTION TO COMPEL  
TO VIDEOCONFERENCE AND PERMITTING PLAINTIFFS' COUNSEL TO APPEAR REMOTELY

1 On May 7, 2024, Defense Counsel and Plaintiff's Counsel conferred and  
2 Defense Counsel does not oppose Plaintiff's request for Plaintiff's Counsel to  
3 appear remotely.

4  
5  
6 Dated: May 8, 2024.

Respectfully submitted,

7  
8 /s/ Chris R. Miltenberger

Chris R. Miltenberger, Esquire

9 The Law Office of Chris R.

10 Miltenberger, PLLC

1360 N. White Chapel, Suite 200

11 Southlake, Texas 76092-4322

12 817-416-5060 (office)

13 817-416-5062 (fax)

chris@crmlawpractice.com

14  
15 Max S. Morgan, Esquire

THE WEITZ FIRM, LLC

16 1515 Market Street, #1100

17 Philadelphia, PA 19102

18 Tel: (267) 587-6240

Fax: (215) 689-0875

19 max.morgan@theweitzfirm.com

20 Craig K. Perry

21 Nevada Bar No. 3786

CRAIG K. PERRY & ASSOCIATES

22 6210 N. Jones Blvd. #753907

23 Las Vegas, Nevada 89136-8985

24 Telephone: (702) 228-4777

25 Facsimile: (702) 943-7520

26 cerry@craigperry.com

27  
28 PLAINTIFF'S MOTION TO CONVERT MAY 15, 2024 HEARING ON PLAINTIFF'S MOTION TO COMPEL  
TO VIDEOCONFERENCE AND PERMITTING PLAINTIFFS' COUNSEL TO APPEAR REMOTELY

1 IT IS HEREBY ORDERED that the Motion to Convert the May 14, 2024  
2 Hearing to Videoconference (ECF No. 37) is GRANTED.

3 IT IS FURTHER ORDERED that counsel for Plaintiff must contact Elvia  
4 Garcia, courtroom deputy for the undersigned Magistrate Judge by **12:00 p.m. on**  
5 **May 10, 2024, at Elvia\_Garcia@nvd.uscourts.gov**, and provide their email  
6 addresses. The courtroom deputy will email Mr. Miltenberger and Mr. Morgan the  
7 Zoom link.

8  
9  
10   
11 Elayna J. Youchah  
12 U.S. Magistrate Judge

13 DATED: May 9, 2024  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27

28 PLAINTIFF'S MOTION TO CONVERT MAY 15, 2024 HEARING ON PLAINTIFF'S MOTION TO COMPEL  
TO VIDEOCONFERENCE AND PERMITTING PLAINTIFFS' COUNSEL TO APPEAR REMOTELY